

EXHIBIT A



**Service of Process
Transmittal**

12/06/2021

CT Log Number 540693557

TO: Cathy Schuda
Target Corporation
1000 NICOLLET MALL
MINNEAPOLIS, MN 55403-2542

RE: Process Served in Michigan

FOR: Target Corporation (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Re: DWIGHT QUERTERMOUS // To: Target Corporation
DOCUMENT(S) SERVED:	--
COURT/AGENCY:	None Specified Case # 2021004360NO
NATURE OF ACTION:	Personal Injury - Failure to Maintain Premises in a Safe Condition
ON WHOM PROCESS WAS SERVED:	The Corporation Company, Plymouth, MI
DATE AND HOUR OF SERVICE:	By Certified Mail on 12/06/2021 postmarked on 12/01/2021
JURISDICTION SERVED :	Michigan
APPEARANCE OR ANSWER DUE:	None Specified
ATTORNEY(S) / SENDER(S):	None Specified
ACTION ITEMS:	CT has retained the current log, Retain Date: 12/06/2021, Expected Purge Date: 12/11/2021 Image SOP Email Notification, Non Employee Litigation Target gl.legal@target.com
REGISTERED AGENT ADDRESS:	The Corporation Company 40600 Ann Arbor Road E Suite 201 Plymouth, MI 48170 877-564-7529 MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

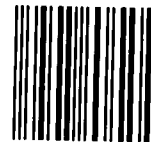
Jeffrey W. Hartkop, P.C.
42490 Garfield Rd., Suite 210
Clinton Township, MI 48038



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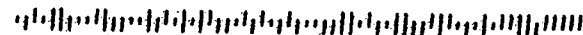
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CLINTON TOWNSHIP, MI
48038
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TARGET CORPORATION
Resident Agent:
The Corporation Company
40600 Ann Arbor Rd E, Ste. 201
Plymouth, MI 48170

48170-467551



JEFFREY W. HARTKOP, P.C.

ATTORNEYS AND COUNSELORS AT LAW
42490 GARFIELD ROAD, SUITE 210
CLINTON TOWNSHIP, MICHIGAN 48038

JEFFREY W. HARTKOP
NATHAN H. HARTKOP

(586) 412-3400
FAX (586) 412-3411

December 1, 2021

Via certified mail

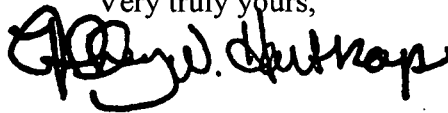
Target Corporation
c/o The Corporation Company
40600 Ann Arbor Rd E, Ste. 201
Plymouth, MI 48170

Re: Quertermous v. Target Corporation
Case No. 21-4360-NO

To whom it may concern:

Enclosed please find a Summons and Complaint and Demand for Jury Trial, copies of which have been filed with the court in the above-entitled matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeffrey W. Hartkop", written over a faint, larger version of the same signature.

Jeffrey W. Hartkop

/kjh
Encl.

Approved, SCAO

Original - Court
1st copy - Defendant

2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN JUDICIAL DISTRICT 16th JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS	CASE NO. 2021-004360-NO
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Court address
40 N. Main Street, Mt. Clemens, MI 48043-5656

Court telephone no.
(586) 469-5351

Plaintiff's name(s), address(es), and telephone no(s). DWIGHT QUERTERMOUS
Plaintiff's attorney, bar no., address, and telephone no. Jeffrey W. Hartkop, Esq. (P41381) Nathan H. Hartkop, Esq. (P80981) Jeffrey W. Hartkop, P.C. 42490 Garfield Rd, Suite 210, Clinton Township, MI 48038 (586) 412-3400

Defendant's name(s), address(es), and telephone no(s). TARGET CORPORATION Resident Agent: The Corporation Company 40600 Ann Arbor Rd E, Ste. 201 Plymouth, MI 48170
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Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. Attached is a completed case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified,

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 11/22/2021	Expiration date 2/22/2022	Court clerk <i>Anthony F. Fournier</i> COUNTY CLERK
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*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

DWIGHT QUERTERMOUS,

Plaintiff,

Case No. 2021-004360-NO

v.

Hon. Julie Gatti


TARGET CORPORATION,

Defendant.

JEFFREY W. HARTKOP, P.C.
JEFFREY W. HARTKOP (P41381)
NATHAN H. HARTKOP (P80981)
Attorneys for Plaintiff
42490 Garfield Road, Suite 210
Clinton Township, 48038
(586) 412-3400 / (586) 412-3411 fax
jhartkop@hotmail.com
nhartkoplaw@gmail.com

COMPLAINT AND DEMAND FOR JURY TRIAL

There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in this complaint.



JEFFREY W. HARTKOP (P41381)
NATHAN H. HARTKOP (P80981)

NOW COMES the Plaintiff, DWIGHT QUERTERMOUS, by and through his attorneys, JEFFREY W. HARTKOP, P.C., and for his Complaint in the above-captioned matter states unto this Honorable Court as follows:

1. Plaintiff, DWIGHT QUERTERMOUS, was at all times pertinent hereto a resident of Chesterfield Township, Macomb County, Michigan.

2. Defendant, TARGET CORPORATION ("TARGET"), upon information and belief, was at all times pertinent hereto, a Minnesota corporation, qualified to do business in Michigan, and is doing business in Macomb County, Michigan, owning and operating a department store located at 51400 Gratiot Avenue, Chesterfield, MI 48051.

3. All incidents giving rise to the instant action occurred in Macomb County, Michigan.

4. The amount in controversy is in excess of the sum of Twenty-Five Thousand (\$25,000.00) Dollars, exclusive of costs, interest and attorney's fees.

5. On or about August 12, 2021, at a time between approximately 8:00 a.m. and 9:00 a.m., Plaintiff, DWIGHT QUERTERMOUS, had entered Defendant's department store at the foregoing Chesterfield location for the purpose of picking up his prescription medications. As such, Plaintiff was a business invitee of the Defendant.

6. On the date and time aforementioned, upon information and belief, Plaintiff was walking near the pharmacy area within Defendant's store when Plaintiff's left foot slipped or tripped on a dangerous condition presently unknown to Plaintiff, causing Plaintiff to fall forward to the floor and briefly lose consciousness in the presence of employees of Defendant.

7. Defendant had actual and/or constructive notice of the aforementioned dangerous condition which caused Plaintiff's fall on its premises.

8. Plaintiff subsequently got himself up from the floor but was in a traumatized state of confusion and dizziness in the presence of employees of Defendant.

9. Employees of Defendant failed to assist Plaintiff while he was in the foregoing traumatized state of confusion and dizziness and permitted him to continue walking unaccompanied in the store without summoning or providing any help or medical attention.

10. Plaintiff then attempted to continue walking in the store when Plaintiff lost consciousness and forcefully fell forward again, striking his face on the floor and resulting in severe personal injuries to Plaintiff hereinafter alleged.

11. On the date and time of the aforesaid incident, Defendant owed certain duties to the Plaintiff under the statutes and common law of the State of Michigan and the applicable local ordinances of Chesterfield Township, Michigan, however Defendant, by and through its authorized agents, servants and/or employees, recklessly, carelessly, wantonly, willfully and negligently, and in violation of said statutes and common law, violated its duties in the following particulars:

- a. By failing to inspect its floors near the pharmacy area which presented a dangerous condition and an unreasonable risk of harm to Plaintiff;
- b. By failing to warn Plaintiff of the aforementioned dangerous condition that was not readily apparent;
- c. By failing to take those adequate measures to correct the aforementioned dangerous condition of which Defendant had notice;
- d. By allowing said dangerous condition to remain at the situs in question when Defendant knew or should have known that the condition created an unreasonable risk of harm to Plaintiff;
- e. By failing to monitor their surveillance cameras which would have alerted them to the existence of said dangerous condition prior to the Plaintiff's initial fall;
- f. By breaching their statutory duty to maintain the premises in accordance with the health and safety laws of the State of Michigan;
- g. By failing to assist Plaintiff while Plaintiff was in a traumatized state of confusion and dizziness in the presence of Defendant's employees following Plaintiff's initial fall within Defendant's department store;
- h. By allowing Plaintiff to continue walking unaccompanied within its store when Plaintiff was in a traumatized state of confusion and dizziness in the presence of Defendant's employees;


- i. By failing to summon or provide medical attention to Plaintiff while he was in a traumatized state of confusion and dizziness in the presence of Defendant's employees;
- j. By performing other acts of negligence not yet known by Plaintiff but which will be ascertained during the discovery of said litigation.

12. As a direct and proximate result of the Defendant's negligence and/or breach of its statutory duties, the Plaintiff sustained bodily injuries which were painful, disabling, and necessitated medical care; in addition thereto, Plaintiff suffered shock and emotional damage, possible aggravation or acceleration of preexisting conditions or reactivation of dormant conditions and was unable to attend his usual affairs, render services as formerly, and hampered said Plaintiff in the enjoyment of the normal pursuit of his life as before; said injuries are permanent to the degree that said Plaintiff will never again enjoy the same state of wellbeing as before the accident herein; said Plaintiff suffered a loss of earnings, loss and ability to earn money as before and will have impaired earning capacity in the future, continued pain and suffering as well as permanency.

WHEREFORE, Plaintiff requests that judgment be entered in his favor against the Defendant in an amount as will fairly and adequately compensate him for his injuries and damages sustained, together with costs, interest and attorney's fees.

Respectfully submitted,

JEFFREY W. HARTKOP, P.C.

By: 
JEFFREY W. HARTKOP (P41381)
NATHAN H. HARTKOP (P80981)
Attorneys for Plaintiff
42490 Garfield Road, Suite 210
Clinton Township, MI 48038
(586) 412-3400

DATED: November 22, 2021

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

DWIGHT QUERTERMOUS,

Plaintiff,

Case No. 2021-004360-NO

v.

Hon. Julie Gatti

TARGET CORPORATION,

Defendant.

JEFFREY W. HARTKOP, P.C.
JEFFREY W. HARTKOP (P41381)
NATHAN H. HARTKOP (P80981)
Attorneys for Plaintiff
42490 Garfield Road, Suite 210
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jhartkop@hotmail.com
nhartkoplaw@gmail.com

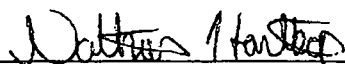
DEMAND FOR JURY TRIAL

NOW COMES the Plaintiff herein, by and through his attorneys, JEFFREY W. HARTKOP, P.C., and hereby demands a trial by jury in the above-entitled matter.

Respectfully submitted,

JEFFREY W. HARTKOP, P.C.

By:


JEFFREY W. HARTKOP (P41381)
NATHAN H. HARTKOP (P80981)
Attorneys for Plaintiff
42490 Garfield Road, Suite 210
Clinton Township, MI 48038
(586) 412-3400

DATED: November 22, 2021